

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IRON MOUNTAIN INCORPORATED;  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.; C. RICHARD  
REESE; JOHN F. KENNY, JR.;  
GARRY B. WATZKE; LARRY L. VAR  
and CHARLES G. MOORE,

Civil Action No. 05 10890 RCL

Plaintiffs and  
Counterclaim Defendants,

V.

THOMAS CARR,

Defendant and  
Counterclaim Plaintiff,

IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.,

Plaintiff,

Civil Action No.  
05 10999 RCL  
(Consolidated)

V.

SYSTRANS FREIGHT SYSTEMS, INC.,

Defendant.

## JOINT MOTION TO EXTEND DEADLINE FOR FACT DISCOVERY

Plaintiffs and Counter-Defendants Iron Mountain Incorporated, Iron Mountain Information Management, Inc., C. Richard Reese, John F. Kenny, Jr., Garry B. Watzke, Larry L. Varn and Charles G. Moore<sup>1</sup> (together, “Plaintiffs”) and Defendants and Counter-Plaintiffs Thomas Carr and Systrans Freight Systems, Inc. (together,

<sup>1</sup> This Court has dismissed all counterclaims against plaintiffs John F. Kenny, Jr., Garry B. Watzke, and Charles G. Moore.

“Defendants”), through their counsel, hereby jointly move to extend the deadline for completion of fact discovery in the above-captioned consolidated matter as described below. In support of this motion, the parties state as follows:

1. Under the current schedule ordered by the Court on December 12, 2006, the deadline for the completion of fact discovery is March 9, 2007.
2. Earlier this month, counsel for Plaintiffs served deposition subpoenas on four of the witnesses identified in Defendants’ initial disclosures: Vincent Brana, Judy Carr, Arthur Peslak, Esq. and Paul Schwartz (the “Witnesses”).
3. Three of the Witnesses are scheduled to be on vacation or otherwise unavailable on the dates commanded in the subpoenas. However, all of the Witnesses are available for deposition and have agreed (through counsel for Defendants) to be deposed in mid-March.
4. To accommodate the schedules of the Witnesses, the parties jointly request that the Court amend the discovery schedule to extend the deadline for completion of fact discovery to March 20, 2007.
5. This extension will not affect any of the other scheduling deadlines currently in place in this action. Furthermore, the requested extension should allow the parties to complete fact discovery in an orderly fashion and accommodate the schedules of the remaining witnesses to be deposed.

WHEREFORE, the parties respectfully request that the Court modify the current schedule and extend the deadline for completion of fact discovery until March 20, 2007.

Dated: January 31, 2007

Respectfully submitted,

**IRON MOUNTAIN INCORPORATED,  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC., C. RICHARD  
REESE AND LARRY L. VARN**

**THOMAS CARR AND SYSTRANS  
FREIGHT SYSTEMS, INC.**

By their attorneys,

By their attorneys,

/s/ Ira K. Gross

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**Certificate of Service**

I hereby certify that the foregoing **Joint Motion to Extend Deadline For Fact Discovery** filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non registered participants on January 31, 2007.

/s/ Kevin M. Colmey